

WARNER NORCROSS & JUDD LLP  
Gordon J. Toering (*Pro Hac Vice* Pending)  
900 Fifth Third Center  
111 Lyon Street, NW  
Grand Rapids, Michigan 49503  
Telephone: (616) 752-2185  
Fax: (616) 222-2185  
Email: gtoering@wnj.com

and

Vickie L. Driver  
Pronske & Patel, P.C.  
1700 Pacific Avenue, Suite 2260  
Dallas, Texas 75201  
Phone: 214.658.6500  
Fax: 214.658.6509  
Email: [vdriver@pronskepatel.com](mailto:vdriver@pronskepatel.com)

Attorneys for MAHLE Engine  
Components USA, Inc.

**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>In re:</b>	§	
	§	
	§	<b>Case No. 08-36705-BJH</b>
<b>SUPERIOR AIR PARTS, INC.,</b>	§	
	§	<b>Chapter 11</b>
<b>Debtor.</b>	§	

**UNOPPOSED MOTION OF MAHLE ENGINE COMPONENTS USA, INC.  
TO EXTEND TIME TO RESPOND TO DEBTOR'S  
MOTION TO RETURN RECLAIMED GOODS (Docket No. 148)**

MAHLE Engine Components USA, Inc. ("Mahle") hereby files its *Unopposed Motion to Extend Time to Respond to Debtor's Motion to Return Reclaimed Goods* (the "Motion"), and states as follows:

1. This motion for extension of time to respond is filed pursuant to Rule 9006(b)(1) of the Federal Rules of Bankruptcy Procedure ("Bankruptcy Rules").

2. On March 5, 2009, the Debtor filed its *Motion to Return Reclaimed Goods* (the “Motion to Return”), seeking to return certain goods to several suppliers, including certain goods to Mahle. Mahle’s deadline to respond to the Motion to Return is March 25, 2009.

3. Currently, Mahle and the Debtor are in negotiations regarding the terms of such return and other related issues. Consequently, the Debtor has agreed to allow Mahle a brief two-week extension of the time to respond to the Motion to Return to allow for the parties to fully discuss potential resolutions to the issues between the parties prior to responding to the Motion to Return.

4. This request will not materially prejudice either party nor delay administration of the adversary or bankruptcy case.

WHEREFORE, PREMISES CONSIDERED, Mahle requests an Order permitting the Mahle to file a response to the Motion to Return up to and including **April 8, 2009**, and for such other and further relief, whether in law or in equity, to which Mahle has shown itself to be entitled.

Dated: March 19, 2009

/s/ Vickie L. Driver

Gordon J Toering (*Admitted Pro Hac Vice*)

WARNER NORCROSS & JUDD LLP

900 Fifth Third Center

111 Lyon Street, NW

Grand Rapids, Michigan 49503

Telephone: (616) 752-2185

Fax: (616) 222-2185

Email: [gtoering@wnj.com](mailto:gtoering@wnj.com)

and

Vickie L. Driver

State Bar No. 24026886

Pronske & Patel, P.C.

1700 Pacific Avenue, Suite 2260

Dallas, Texas 75201

Phone: 214.658.6500

Fax: 214.658.6509

Email: [vdriver@pronskepatel.com](mailto:vdriver@pronskepatel.com)

Attorneys for MAHLE Engine

Components USA, Inc.

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that on March 19, 2009, I corresponded via email with counsel for the Debtor, Duane Brescia, who confirmed that the Debtor does not oppose the relief sought in this Motion.

/s/ Vickie L. Driver  
Vickie L. Driver

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing document was served (i) by filing the Motion via the Court's electronic noticing system (ECF) to the parties receiving notice via ECF, and to (ii) the Debtor, Debtor's counsel, and parties requesting notice by first class mail, postage prepaid on this 19<sup>th</sup> day of March, 2009.

/s/ Vickie L. Driver  
Vickie L. Driver